

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Fairfield Sentry Limited, et al.,

Debtors in Foreign Proceedings.

Fairfield Sentry Limited, et al. (In Liquidation),  
acting by and through the Foreign Representatives  
thereof,

Plaintiffs,

– against –

Theodoor GGC Amsterdam et al.,

Defendants.

FAIRFIELD SENTRY LIMITED (IN  
LIQUIDATION), et al.,

Plaintiffs,

-against-

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

FAIRFIELD SENTRY LIMITED (IN  
LIQUIDATION), et al.,

Plaintiffs,

-against-

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

Ch. 15 Case

Case No. 10-13164 (CGM)

Jointly Administered

Adv. Pro. No. 10-03496 (CGM)

Procedurally Consolidated  
Under this Matter

Adv. Pro. No. 10-03635 (CGM)

Adv. Pro. No. 10-03636 (CGM)

**KATTEN DEFENDANTS' (1) OBJECTION TO LIQUIDATORS'  
PROPOSED SCHEDULING ORDER ON PERSONAL JURISDICTION  
BRIEFING AND DISCOVERY AND (2) STATEMENT IN SUPPORT  
OF THE HSBC DEFENDANTS' NOTICE OF COUNTER-PROPOSED ORDER**

**PLEASE TAKE NOTICE** that Coutts & Co. Ltd. (f/k/a RBS Coutts Bank Ltd.) (“Coutts”), Lloyds Bank plc (f/k/a Lloyds TSB Bank Geneva) (“Lloyds”), and Harmony Capital Fund Ltd. (“Harmony”) (collectively, the “Katten Defendants”) in the above-captioned administratively consolidated proceedings hereby join and incorporate by reference (i) the *HSBC Defendants' (1) Objection to Liquidators' Proposed Scheduling Order on Personal Jurisdiction Briefing and Discovery and (2) Notice of Counter-Proposed Order* (ECF No. 3884) (the “HSBC Objection”)<sup>1</sup> and (ii) the *HSBC Defendants' counter-proposed order accompanying the HSBC Objection* (ECF No. 3884-1) (the “HSBC Defendants' Proposed Order”) filed on September 27, 2021 by HSBC Securities Services (Luxembourg) S.A., HSBC Private Bank (Suisse) S.A., and HSBC Bank USA, N.A. (collectively, the “HSBC Defendants”) in the above-captioned administratively consolidated proceedings.

This joinder is not and shall not be construed as a waiver of any of the jurisdictional, substantive, or procedural rights, remedies, and defenses of the Katten Defendants.

For all of the reasons set forth in the HSBC Objection, the Katten Defendants object to the Liquidators' Proposed Order, and respectfully request that the Court enter the HSBC Defendants' Proposed Order.

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<sup>1</sup> Unless otherwise noted, references to “ECF No. \_\_\_” are to entries in Adv. Pro. No. 10-03496.

Dated: September 28, 2021  
New York, New York

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

BY: /s/ Mark T. Ciani

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